

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CONCORD MANAGEMENT AND  
CONSULTING LLC

Defendant.

Crim. No. 18-CR-32-2 (DLF)

**GOVERNMENT'S MOTION FOR LEAVE TO FILE UNDER SEAL**

The United States of America respectfully moves for leave to file under seal its opposition to defendant Concord Management and Consulting LLC's motion to compel (Dkt. No. 78). The government's opposition discusses a "matter occurring before the grand jury," Fed. R. Crim. P. 6(e)(2)(B). Therefore, filing the opposition under seal is appropriate under Federal Rule of Criminal Procedure 6(e)(2)(B)(vi) and Rule 6(e)(6).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2019 I caused a copy of the foregoing motion for leave to file under seal to be transmitted to Katherine Seikaly and Eric Dubelier, counsel of record for Concord Management and Consulting LLC, via email and first class mail.

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